

From: Arvizu, Christy

Sent: Thursday, October 06, 2016 12:07 PM

To: 'Latessa, Sara H (DEC)' <Sara.Latessa@dec.ny.gov>

Subject: RE: Record Keeping Requirements for CAFO Permittees

Hi Sara –

Just a few other thoughts I had re: recordkeeping that I jotted down last week and never forwarded...

- Any additional records required by Part III.A.4.b-d of the Permit
- Copies of CAFO Incident Reports (Appendix D) (not sure if the Appendix reference changed?)
- Annual Compliance Reports
- Records required by site specific O&M plans (as these are referenced in NRCS standards)
 just realized this is a repeat/variation of my comment from last week
- Any other records that may be cited in NRCS 590 that are not already included in your list

Thanks! Christy

From: Arvizu, Christy

Sent: Monday, September 26, 2016 1:41 PM

To: 'Latessa, Sara H (DEC)' < <u>Sara.Latessa@dec.ny.gov</u>>

Subject: RE: Record Keeping Requirements for CAFO Permittees

HI Sara -

Thanks for the message – I was out of the office on travel last week and didn't get a chance to look at this until today.

Looks good at first glance, I'll take another in-depth look before tomorrow AM but wanted to let you know that I would recommend adding the following:

- Records documenting implementation of O&M plans since those are usually referenced in various NRCS standards.
- Records documenting the current design of any manure or litter storage structures, including volume for solids accumulation, design treatment volume, total design volume,

and approximate number of days of storage capacity (412.37(b)(5))

Christy

From: Latessa, Sara H (DEC) [mailto:Sara.Latessa@dec.ny.gov]

Sent: Wednesday, September 21, 2016 1:44 PM **To:** Arvizu, Christy Arvizu.Christy@epa.gov

Subject: Record Keeping Requirements for CAFO Permittees

Hi Christy,

Just wanted to share with you my list of Record Keeping Requirements for permittees... any comments/thoughts? I basically took EPAs list and added a few NY specific things.

Sara H. Latessa

Environmental Program Specialist, Division of Water

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